

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filter Products
Liability Litigation

Case No. MDL 15-02641-PHX-DGC

QUALIFIED PROTECTIVE ORDER (REDACTED)

The individuals listed on attached Exhibit A have asserted claims against defendants in the above captioned action. These individuals have retained McSweeney/Langevin, LLC (“Counsel”) to represent them in relation to the above-captioned action. Counsel agrees that they represent the individuals identified in Exhibit A.

IT IS HEREBY ORDERED:

1. By virtue of their status as Counsel for the individuals listed on Exhibit A, Counsel shall resolve any potential Part A and/or Part B fee-for-service Medicare Secondary Payer (MSP) claim(s) related to settlements, judgments, awards, or other payments associated with the above captioned action for those individuals on Exhibit A who are or were Medicare beneficiaries.
2. Counsel has also retained ARCHER Systems, LLC (“ARCHER”) to identify and resolve potential healthcare liens with Medicaid agencies, TRICARE, Veteran’s Administration, Department of Defense, Indian Health Services, and private health insurers, (hereinafter,

collectively “the Agencies”) claim(s) related to settlements, judgments, awards, or other payments associated with the above captioned action for those individuals on Exhibit A who are or were beneficiaries of the Agencies.

3. The entry of this HIPAA-compliant qualified protective order is necessary in this action in order to permit the Agencies to transmit lists of information, including protected health information and other related information regarding the individuals listed on Exhibit A to ARCHER, rather than providing copies of individual HIPAA authorizations and information on a claimant-by-claimant basis, including any third party authorized by ARCHER or the Court to assist in the resolution of the Agencies’ potential liens and reimbursement claims.

4. As such, it is hereby ordered:

- a. This Qualified Protective Order shall apply to all “protected health information” and “individually identifiable health information,” as defined by 45 CFR § 160.103, or information that is otherwise protected from disclosure by the Privacy Act, 5 U.S.C. § 551a, the Health Insurance Portability and Accountability Act of 1996, Pub. L. 104-191, 42 CFR § 431 Subpart F, titled “Safeguarding Information on Applicants and Recipients” and other applicable state law, created, received or collected from plaintiffs and claimants by the Agencies, including, but not limited to: (a) names and addresses, dates of birth, social security numbers, identification numbers and other demographic information that identifies, or could be used to identify the individuals listed on Exhibit A; (b) eligibility and entitlement information for the individuals listed on Exhibit A; (c) claims information relating to the past, present, or future health care of the individuals listed on Exhibit A; (d)

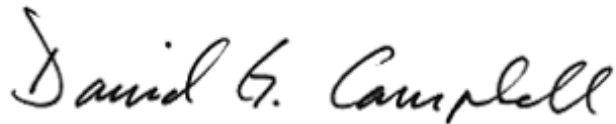
1 claims information relating to the provision of healthcare to the individuals listed
2 on Exhibit A; and, (e) claims information relating to the past, present, or future
3 payment for the provision of healthcare to the individuals listed on Exhibit A.

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5 b. Each Agency is hereby authorized and directed to transmit to ARCHER to assist in
6 the resolution of potential liens or reimbursement claims, any information,
7 including claims information and other protected health information, for those
8 individuals listed on Exhibit A against whom they may assert liens or
9 reimbursement claims.

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11 c. ARCHER shall not use or disclose any protected health information or individually
12 identifiable health information subject to this Qualified Protective Order for any
13 purpose other than this litigation, including compliance with any applicable Court
14 orders or other legal obligations. Similarly, the Agencies shall only use the
15 information listed on Exhibit A for the specific purposes of transmitting to
16 ARCHER any information, including claims information and other protected health
17 information, for those individuals listed on Exhibit A in the above-captioned matter
18 against whom the Agencies have asserted liens or reimbursement claims, or in
19 whose potential settlements the Agencies may have an interest. The Agencies shall
20 only make the information for the individuals listed on Exhibit A available to those
21 within their respective Agency who need access to the information for the
22 individuals listed on Exhibit A for the specific purpose stated in this paragraph. If
23 the Agency utilizes outside vendors or companies to perform part or all of their tort
24 recovery practices, the outside vendors or companies shall be expressly bound by
25 all terms and conditions of this Qualified Protective Order.
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1 d. ARCHER shall maintain any protected health information or individually
2 identifiable health information subject to this Qualified Protective Order in a secure
3 and safe area and shall exercise the same standard of due and proper care with
4 respect to the storage, custody, use and/or dissemination of such protected health
5 information as is exercised by ARCHER with respect to its own confidential
6 proprietary information.
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8 Dated this 7th day of March, 2022.
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12 David G. Campbell
13 Senior United States District Judge
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EXHIBIT A

Last Name	First Name	DOB
Alaway	Loretta	/1957
Alcorn	Vyrl	/1945
Alfonso	William	/1982
Alford	Tammy	/1967
Allen Morgan	Darline	/1955
Alvarez	Roman	/1971
Alvarez	Carmen	/1944
Ames	Kevin	/1964
Anderson	Ronald	/1968
Andrews	Raymond	/1938
Andrews	Debra	/1960
Arasteh	Bibi	/1957
Arasteh	Bibi	/1957
Armstrong	Karlie	/1993
Arnold	Patrick	/1949
Arrington	Mose	/1954
Atkinson	Gary	/1952
Atkinson	Gary	/1952
Baez	Sally	/1990
Bagley	Emily	/1934
Baham	Sarah	/1956
Baker	Carol	/1956
Baker	Carol	/1956
Ballard	Donnell	/1967
Balogh	Melody	/1966
Barbot Jr.	Edgar	/1958
Barrick	Terry	/1948
Bartlett	Adele	/1946
Bartlow	Lisa	/1975
Bass	James	/1951
Belloise	Linda	/1955
Belloise	Linda	/1955
Benedict	Destinee	/1994
Berry-Boles	Margaret	/1963
Berstler	Lisa	/1966
Blakeney	Ricky	/1957
Bowers	Robby	/1978
Brauer	Deon	/1979
Brauer	Deon	/1979
Brewer	Denise	/1951

Last Name	First Name	DOB
Lair	Steve	/1951
Lamb	Rosemond	/1945
Lamore	Donald	/1945
Lange	Rhonda	/1973
Lantz	Dawn	/1961
Lawson	John	/1964
Leamon	Zachary	/1986
Leavelle	Steve	/1965
Lee	Davey	/1973
Leighton	Juanita	/1954
Lewis	Lloyd	/1956
Lewis	Cynthia	/1954
Logan	Alfreda	/1976
Logan	Alfreda	/1976
Long	Theresa	/1962
Long	Theresa	/1962
Lopez	Jenny	/1982
Lorey	Virginia	/1954
Lozinak	George	/1941
Mackey	Brinder	/1958
Magee	Angela	/1970
Mahlman	Rex	/1964
Marano	Kristin	/1984
Markley	James	/1935
Marmolejo	Aurelio	/1980
Marok	James	/1970
Marshall	Carl	/1976
Marshall	John	/1969
Martin	Anita	/1960
Martin	Wanda	/1941
Martin	Wanda	/1941
Martin	Lori	/1957
Martinez	Michael	/1969
Martinez	Michael	/1969
Martinez	Maria	/1955
Martinez	Maria	/1955
Masiello	John	/1948
Mason	Christopher	/1968
Mason	Gregory	/1975
Mata	Dennis	/1965

1	Brickley	Kyana	/1970
	Brickley	Kyana	/1970
2	Brossett	Sharon	/1967
3	Broussard	Shane	/1971
	Brown	Kendrick	/1978
4	Brown	Loraine	/1966
5	Brown	Loraine	/1966
	Buccini	Elizabeth	/1944
6	Buccini	Elizabeth	/1944
7	Buchan	Jerry	/1987
	Bull	Richard	/1952
8	Burkert	Betty	/1935
9	Burney	Timothy	/1980
	Burrell	Felecia	/1966
10	Butler	Jonathan	/1979
11	Butler Sr.	Michael	/1961
	Calloway	Sherrill	/1977
12	Caputo	Joseph	/1955
	Carnegie	Averil	/1958
13	Cates	Charles	/1956
14	Chambers	Fredrick	/1964
	Chatfield	Marcia	/1963
15	Cheek	Deana	/1964
16	Cianferano	Tammy	/1962
	Clark	Kathleen	/1947
17	Clark	Patti	/1953
18	Clelland	Joyce	/1942
	Clelland	Joyce	/1942
19	Conrad	Lisa	/1963
20	Conrad	Lisa	/1963
	Cook	Laura	/1964
21	Cook	China	/1994
22	Cooper	Harold	/1954
	Cooper	Ricky	/1958
23	Cotter	Vernon	/1955
	Craft	Bennie	/1941
24	Crosby	Beverly	/1957
25	Crutchfield	Linda	/1960
	Crutchfield	Linda	/1960
26	Custer	George	/1956
27	Davis	Terry	/1961
	Davis	Marian	/1959
28	Dean	Herbert	/1948

Mathews	Kimberly	/1960
McCabe	Eleanor	/1929
McCollum	Melissa	/1968
McCrary	Jennifer	/1983
McElroy	Cindy	/1967
McKeefry	Travis	/1982
McMillian	James	/1969
McMillian	Darlene	/1963
Melinski	Cathy	/1964
Mello	Elizabeth	/1987
Mello	Elizabeth	/1987
Merritt	Roger	/1951
Miller	Yvonne	/1948
Miller	Brent	/1967
Miller	Vickie	/1951
Mitchell	Will	/1977
Moore	Tracy	/1963
Morgan	Sharleatha	/1958
Morgan	Robin	/1966
Morgan	Mona	/1937
Morris	Monda	/1952
Mota-Medina	Isa	/1992
Muhammad	Khalilah	/1964
Mullins	Nicholas	/1986
Mullins	Nicholas	/1986
Mustoe	Robert	/1960
Navarrete	Ana	/1969
Neely IV	William	/1975
Neely IV	William	/1975
Newton	Aaron	/1975
Nunn	Berthena	/1955
Oakes	Jeremy	/1981
Orso	Randy	/1974
Orso	Randy	/1974
Ortiz	Jimmie	/1956
Ott	Eve	/1936
Paige	Glenn	/1948
Parker	Katherine	/1957
Parr	Michael	/1981
Parrish, Jr.	Roy	/1955
Patchman	Jerry	/1941
Pennington	Coty	/1990
Pennington	Vickie	/1962

1	Dedon	John	/1947
	DeJesus	Martin	/1964
2	DeMasi	Sandra	/1936
3	DeMille	Carolena	/1943
	Denison	Timothy	/1963
4	Dennis	Walter	/1956
5	Difulvio	Kathleen	/1955
	Dilgard	Jennifer	/1968
6			
7	Doszpoly	Jane	/1955
	Draper	Christopher	/1968
8	Drazdys	Andrius	/1967
	Drolet	Vicky	/1969
9	Duncan	Betty	/1931
10	Dunnaway	Terrence	/1976
	Durden	Dorothy	/1982
11	Eaker	Thomas	/1951
12	Edelbeck	Irene	/1982
	Ehli	Rodney	/1964
13	Ellet	John	/1963
14	England Harp	Martha	/1966
	England Harp	Martha	/1966
15	Evans	Teresa	/1959
16	Evans	Clifton	/1981
	Evans	Rickey	/1953
17	Fennell	William	/1943
18	Ferguson	Michael	/1955
	Ferguson	Todd	/1970
19	Figard	Stephen	/1971
20	Finch	Sheila	/1961
	Fiore	Frederick	/1937
21	Fitzgerald-		
	Johnson	Loretta	/1967
22	Ford	Francis	/1969
23	Ford	William	/1957
	Fries	Glenn	/1958
24	Frost	Cheryl	/1959
25	Frost	Cheryl	/1959
	Fuller	Frank	/1940
26	Gain	Mark	/1958
27	Gardner	Ann Marie	/1969
	Gerkin	Chad	/1979
28	Gillespie	Jennifer	/1982

	Perez	Robert	/1953
	Petersen	Elizabeth	/1981
	Phariss	Charles	/1954
	Philmore	David	/1971
	Powell	Clifton	/1962
	Price	George	/1956
	Pryor	Kyle	/1977
	Ray	Laura	/1935
	Reazer-		
	Kremitzki	Vicki	/1954
	Reeves	Johnny	/1944
	Reid	Carla	/1964
	Rimmer	Matthew	/1985
	Rinaldo	John	/1954
	Risner	Sonya	/1966
	Robbins	Ingrid	/1947
	Robinson	Mercedes	/1993
	Rogers	Azile	/1942
	Roody	Mary	/1954
	Roos	Kathy	/1959
	Rose	Debra	/1960
	Ruiz	Juan	/1960
	Ruth	Melinda	/1971
	Sadler	Carol	/1939
	Salter	James	/1959
	Salter	James	/1959
	Sanchez	Joseph	/1946
	Schilling	Sherry	/1955
	Schilling	Sherry	/1955
	Schoultz	Mattie	/1939
	Seidler	Ian	/1942
	Seidler	Ian	/1942
	Sessoms	Ethel	/1960
	Sessoms	Ethel	/1960
	Shannon	Theresa	/1954
	Shedd	Kelly	/1973
	Shervino	Thomas	/1947
	Shirey	Charles	/1955
	Shults	Cynthia	/1952
	Siefker	Arnold	/1936
	Simpkins	Sabrina	/1980
	Sims	Teddy	/1951

1	Gillum	Frank	/1949
	Ginnett	Gwendolyn	/1951
2	Giordano	Michael	/1952
3	Gissen	Lynn	/1959
	Glasgow	Brian	/1977
4	Gomes	Alice	/1993
5	Goodall Jr.	David	/1966
	Goodman	Korondia	/1973
6	Goodwin	Douglas	/1942
7	Greathouse	Samantha	/1977
	Gregg	George	/1937
8	Gross	Jacky	/1976
9	Gross	Jacky	/1976
	Guillard	Ella	/1932
10	Guinn	Catherine	/1962
	Gunter	Gregory	/1965
11	Hale	Joel	/1967
12	Hall	Gailyn	/1961
	Hall	Robert	/1954
13	Haney	Terry	/1963
14	Harmon	Atlean	/1938
	Harmon	Tammy	/1984
15	Harmon	Jacqueline	/1954
16	Harrelson	Jennifer	/1956
	Haskins	Rodney	/1957
17	Hawkey	Barry	/1959
18	Hawkins	Martha	/1946
	Hercules	Jamie	/1974
19	Hicks	Christy	/1981
20	Hollender	Nancy	/1953
	Hostetler	Gary	/1944
21	Houck	Christopher	/1971
22	Houck	Christopher	/1971
	Hunt	Jeanne	/1948
23	Hutchins	Russell	/1966
24	Ickes	Christopher	/1957
25	Inman	Mary	/1950
26	Jankowski	Alexander	/1991
27	Janosov	Joseph	/1961
	Jends	Sandra	/1964
28	Jimmerson	Thomas	/1942

	Small	Emily	/1966
	Smith	Raymond	/1961
	Smith	Sherry	/1972
	Smith	Kevin	/1936
	Smith	Larry	/1965
	Snyder	Randy	/1950
	Snyder	William	/1955
	Sottler	Brenda	/1957
	Stagmaier	Kurt	/1951
	Stagmaier	Kurt	/1951
	Stanko	Lori	/1960
	Stanley	Barbara	/1945
	Starnes	Christopher	/1976
	Stephens	Barbara	/1942
	Stevenson	Corrine	/1956
	Stillwell	Billy	/1948
	Stratton	Brenda	/1968
	Strickland	Denise	/1951
	Strickland	Denise	/1951
	Sundmacher	Wayne	/1953
	Swint	Denise	/1967
	Swope	William	/1951
	Tabron	Lisa	/1967
	Taylor	Patsy	/1966
	Taylor	Roy	/1966
	Taylor	Wanda	/1966
	Thacker	Sharon	/1966
	Thigpen	Charles	/1948
	Thompson	Sandra	/1952
	Tingling	Lanette	/1975
	Towery	Rebecca	/1954
	Trabal	Jacqueline	/1969
	Trailer	Jerome	/1959
	Trudeau	Penelope	/1949
	Urbin	Clarence	/1941
	Urbin	Clarence	/1941
	Varela		
	Linares	Salvador	/1961
	Varela	Salvador	/1961
	Linares		
	Wade	Naurice	/1991
	Wagner	Joan	/1934
	Walden	Robert	/1960

1	Johnson	Delorise	/1949
	Johnson	Michael	/1973
2	Johnston	Phillip	/1958
3	Jones	William	/1935
	Jones	Lisa	/1969
4	Jones	Christopher	/1978
5	Jones	Christopher	/1978
	Jones	Mary Kay	/1951
6	Jones	Marshell	/1963
7	Jordan	Trudi	/1952
	Jordan	Daquita	/1984
8	Jorgensen	Jeffrey	/1961
9	Kansier	Gregory	/1956
	Keith	Neil	/1961
10	Kellam	Lazaundra	/1979
11	Kendrick	Lynda	/1943
	Kimmons	Sheila	/1949
12	King	Rogers	/1970
	King	William	/1945
13	Konrad	Lawrence	/1942
14	Koumado	Komlavi	/1977
	Kritchen	Donna	/1956
15	Kudelin	MaryJane	/1961
16	Kurzer	Raymond	/1956
	Kwiatkowski	Coleene	/1957
17	Kwiatkowski	Coleene	/1957

Walk	Daniel	/1951
Walker	Bobby	/1961
Walker	Patricia	/1957
Wall-Valadez	Denise	/1952
Waring	Christopher	/1984
Watkins	James	/1944
Watkins III	David	/1963
Watson	Jennifer	/1962
Welch	Frances	/1940
Whitcotton	Michael	/1942
Wiedenbeck	Jody	/1967
Wiles	Angelique	/1975
Williams	Ella	/1954
Williams	Robin	/1967
Williams	Edward	/1962
Williams	Edward	/1962
Williams	Barbara	/1964
Williams	Charles	/1952
Williams	Wendell	/1973
Wolcyk	Robert	/1967
Woy	William	/1964
Wright	Donald	/1956
Yiengst	Linda	/1946
Zagorski	Christopher	/1960
Zelenak	Kenneth	/1959
Zorn	William	/1941